



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
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Pat Quinn, Governor
Marc Miller, Director

March 26, 2010

Mr. James A. Cavanaugh
Illinois Dept. of Agriculture
2280 Bethany Road
Suite B
DeKalb, IL 60115

**Re: Gypsy Moth Control Plan – Aerial Application of *Bacillus thuringiensis kurstaki* (BtK)
(Site 4 of 8) – Plano
Endangered Species Consultation Program
Project Number(s): 1007012
County: Kendall**

Dear Mr. Cavanaugh:

This letter is in reference to one of the 27 Gypsy Moth Aerial Spraying blocks your Department submitted for consultation in accordance with the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075. This location is in Sections 2 and 3, Township 36 North, Range 6 East and Sections 34 and 35, Township 37 North, Range 6 East, for consultation

The project involves the aerial application of BtK two times during the last three weeks of May over a large area between the Fox River and Fox Road; the enclosed EcoCAT report shows the spray area, part of which includes property owned by the Illinois Department of Natural Resources (IDNR), and the **Silver Springs Fen Illinois Natural Area Inventory Site (INAI)**. Within the vicinity of the spray area are additional resources, including **Fox River INAI Site; American Brooklime**, *Veronica americana*; **River Redhorse**, *Moxostoma carinatum*; and **Osprey**, *Pandion haliaetus*.

BtK is an insecticide harmful to all moths and butterflies (Lepidoptera) that are in their caterpillar stage – caterpillars that ingest BtK as they consume leaves sprayed with BtK die when the BtK spores are activated in the insects' stomachs. It works by paralyzing the digestive system and the infected insects stop feeding within hours; the moths and caterpillars die from starvation, which can take several days. The Department is concerned that all native Lepidoptera species within the vicinity of each spray block will be killed, negatively impacting local Lepidoptera populations, adversely impacting food sources for birds, mammals, amphibians, and reptiles, and impacting pollinators of listed plants.

The Department has completed its review of this project and determined that the action will not have an adverse impact on the protected resources. However, since a large portion of the spray block will be over land owned and managed by the Department, the following measures must be implemented.

1. The Site Superintendent of Silver Springs State Park, Jeff Wepprecht, (630/553-6297), and the Department's Public Information Officer, Chris McCloud (217/785-4501), should both be notified at least 48 hours in advance of the spray period so that they can have ample time to prepare park personnel, and visitors, for the spraying event.
2. If the Department of Agriculture has spray protocols it uses to address the gypsy moth eradication process, these should be provided as soon as possible to the Site Superintendent and Public Information Officer.
3. Spraying should not commence until the Illinois Nature Preserve Commission (INPC) has been contacted and appropriate permits, if necessary, obtained. If spraying is to occur within 300' of the boundary of a Nature Preserve or a Land and Water Reserve, or there is potential for drift into an INPC Site, then INPC will require a permit.
4. Spraying should not be conducted over the Silver Springs Fen INAI Site because of the graminoid fen present within its boundaries; contact the Site Superintendent for the location of this INAI.

Consultation on the part of the Department is completed. **In accordance with 17 Ill. Adm. Code 1075.40(h), the Department of Agriculture must notify the Department of its decision regarding these recommendations, whether they will:**

- Allow the action to proceed as originally planned;
- Require the action to be modified per Department recommendations (please specify which measures if not all will be required); or
- Forgo the action.

This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resources review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected species are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this consultation review.

Cordially,



Kathi Davis
Division of Ecosystems and Environment
Impact Assessment Section
Office of Realty & Environmental Planning
217-785-5500

enclosure

cc: Dan Kirk, IDNR/Region II/Natural Heritage
Joe Rogus, IDNR/Region II/Wildlife
Jeff Wepprecht, IDNR Office of Land Management
Tim Hickmann, IDNR Office of Land Management
Chris McCloud, Central Management Services
Kelly Neal, Illinois Nature Preserves Commission
Kim Roman, Illinois Nature Preserves Commission